

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

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**UNITED STATES OF AMERICA**

Plaintiff,

Case No. 1:23-cr-20676-TLL

Hon. Thomas Ludington

v.

**JEFFREY BARTLETT,**

Defendant.

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**NOTICE OF ERRATA REGARDING ECF NO. 229**

Mr. Jeffrey Bartlett, by his counsel, submits this factual supplement to correct the record regarding ECF No. 229. Specifically, at PageID.2444-2445, Mr. Bartlett contested the assertion by the government that he and Ms. Bartlett “are not legally married in Michigan”. *Id.*

On further review, it appears that the celebrant who conducted Mr. and Mrs. Bartlett’s wedding ceremony in Costa Rica was, as the government alleged in its motion, not authorized under the laws of Costa Rica to legalize a marital contract in Costa Rica. This impacts the

analysis in defendant's response brief because "[t]he rule in Michigan is that the validity of a foreign marriage must be determined by reference to the domestic relations law of the country of celebration." *Stankevich v. Milliron*, 313 Mich. App. 233, 240 n.3, 882 N.W.2d 194, 198 (2015); Resp., ECF No. 229, PageID.2444-2445. As such, the religious wedding ceremony in Costa Rica would not be recognized under the laws of the State of Michigan.

Respectfully Submitted,  
**BLANCHARD LAW**

Dated: June 19, 2025

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